

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #20

DATED: June 25, 2001

ITEM: ATT-VZ 20-1 Refer to Verizon's response to ATT-VZ -VZ 8-1. For each item listed in the first column of the ATT-VZ attachment, please provide the appropriate cite to both the existing tariff and to Verizon's cost study, as requested in ATT-VZ -VZ 8-1.

REPLY: Please see Verizon MA's response to ATT 19-1.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #20

DATED: June 25, 2001

ITEM: ATT-VZ 20-2 Refer to Verizon's response to ATT-VZ -VZ 8-1. For each item listed in the first column of the ATT-VZ attachment, please provide a fuller description of such item, including the activities the charges for such item are suppose to cover.

REPLY: Please see DTE Tariff No. 17, Part A Section 3.3, and Part B, Sections 12.2.4 and 18.1.5.B.

VZ # 545

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

REQUEST: AT&T Communications of New England, Inc., Set #20

DATED: June 25, 2001

ITEM: ATT-VZ 20-3 Refer to Verizon's response to ATT-VZ -VZ 8-1, wherein it states

"The information provided in the ATT-VZ ached table applies with the following assumptions: . . . Tariff rates from 1/20/01 tariff."

Is Verizon proposing in this proceeding to charge the rates presently set forth in the existing Tariff No. 17, or is it proposing to charge different rates? If Verizon is proposing to charge different rates, please state what rates Verizon is proposing to charge and, for each such rate,

- a. identify the specific parts of the Verizon cost study that develop and support such rate; and
- b. identify the tariff section that describes the application of such rate and the section that states the existing rate level.

REPLY:

- a. Please see Verizon MA's response to ATT 19-1.
- b. Please see Verizon MA's responses to ATT 19-1 and 20-2.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #21

DATED: June 25, 2001

ITEM: ATT-VZ 21-1 Provide Verizon – MA's average percentage of defective copper feeder and distribution pairs at the finest level of detail maintained by Verizon – MA. Include in your answer the source of all data presented.

REPLY: Engineering records are only maintained for copper feeder pairs. Verizon MA objects to the second part of this question concerning distribution copper. This information is not available and would require a burdensome special study to derive the data.

For year-end 2000, the percentage of defective copper feeder pairs by wire center ranged from approximately 3% to 13% with a State average of 9.6%.

VZ # 551

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #21

DATED: June 25, 2001

ITEM: ATT-VZ 21-2 Provide Verizon - MA's average percentage of defective pairs for all copper feeder cable in the Verizon – MA service territory. If Verizon – MA claims the information is unavailable for copper feeder cable, provide an estimate of the percentage of defective pairs for all copper cable in Verizon – MA's service territory. Include in your answer the source of all data presented.

REPLY: Please see Verizon MA's response to ATT 21-1

VZ # 552

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #21

DATED: June 25, 2001

ITEM: ATT-VZ 21-3 Provide Verizon - MA's average percentage of defective pairs for all copper distribution cable in the Verizon – MA service territory. If Verizon – MA claims the information is unavailable for copper distribution cable, provide an estimate of the percentage of defective pairs for all copper cable in Verizon – MA's service territory. Include in your answer the source of all data presented.

REPLY: Please see Verizon MA's response to ATT 21-1.

VZ # 553

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: John Livecchi
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #21

DATED: June 25, 2001

ITEM: ATT-VZ 21-4 In response to request ATT 14-4, Verizon – MA explained that on a case-by-case basis, a switch engineer or outside plant engineer, may provide for completion of construction of additional plant capacity before reaching the general administrative spare levels. Have there been any situations from January 1, 1999 to the present in which the administrative spare levels have been achieved and no additional plant capacity construction was authorized? If the answer is anything but an unqualified no, fully describe and provide details of 5 examples of such circumstances. Include in your answer the source of any data presented.

REPLY: Yes. As noted in Verizon MA's response to ATT 3-5, Section 6.0 of Verizon Facility Management Letter, 1998-00397-OSP, states in Scenario 1 a clear example of when the local loop planner/designer would not authorize additional plant capacity to be constructed.

**Verizon New England Inc.
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D.T.E. 01-20 (Part A)

Respondent: Donald Albert
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #21

DATED: June 25, 2001

ITEM: ATT-VZ 21-5 Fully describe and provide details of the five largest (dollar amount) digital switch retirements of the \$62 million in digital switch retirements identified in response to ATT 14-9. Include in your answer the source of any data presented.

REPLY: Verizon MA objects to this request on the grounds that the information is not readily available and would require a burdensome special study to derive the data.

VZ # 555

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Donald Albert
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #21

DATED: June 25, 2001

ITEM: ATT-VZ 21-6 Fully describe and provide details of the five largest (dollar amount) digital circuit retirements of the \$40 million in digital circuit retirements identified in response to ATT 14-9. Include in your answer the source of any data presented.

REPLY: See response to ATT-VZ 21-5.

VZ # 556

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Donald Albert
Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #21

DATED: June 25, 2001

ITEM: ATT-VZ 21-7 Fully describe and provide details of the five largest (dollar amount) OSP Copper cable retirements of the \$36 million in OSP copper cable retirements identified in response to ATT 14-9. Include in your answer the source of any data presented.

REPLY: See response to ATT-VZ 21-5

VZ # 557

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: AT&T Communications of New England, Inc., Set #21

DATED: June 25, 2001

ITEM: ATT-VZ 21-9 Describe, providing all available detail, the ten largest (in terms of dollar amount) debit journal entries (along with all associated credit entries) made by Corporate Accounting to the Verizon – MA network accounts for reimbursement by a municipality or customer for reconfigurations, moves, changes or upgrades as described in Verizon – MA’s response to ATT 14-18. Include in your answer the source of any data presented.

REPLY: Verizon MA objects to this request on the grounds that the requested information is not readily available and would require a burdensome special study to derive the data. Please see Verizon MA’s response to ATT 14-18.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Michael J. Anglin
Title: Director-Service Costs

REQUEST: AT&T Communications of New England, Inc., Set #21

DATED: June 25, 2001

ITEM: ATT-VZ 21-10 Describe, providing all available detail, the ten largest (in terms of dollar amount) credit journal entries (along with all associated debit entries) made by Corporate Accounting to the Verizon – MA network accounts for reimbursement by a municipality or customer for reconfigurations, moves, changes or upgrades as described in Verizon – MA’s response to ATT 14-18. Include in your answer the source of any data presented.

REPLY: Please see Verizon MA’s response to ATT 21-9.